

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:21-CR-00275
	)	Judge Richardson
KIMBERLY HODGE,	)	
a/k/a KIMBERLY HUGHEN	)	
	)	
Defendant.	)	

MOTION FOR ENTRY OF FORFEITURE MONEY JUDGMENT

The United States of America moves for entry of a Consent Order of Forfeiture consisting of a \$222,568.53 United States currency Money Judgment as to Counts One and Three of the Indictment (“Order of Forfeiture”). *See* Fed. R. Crim. P., 32.2 (a), (b)(1)(A), (b)(2)(A), (b)(4)(B), and (c)(1). As grounds the United States respectfully submits:

1. The Forfeiture Allegation of the Indictment gave the Defendant notice of the United States’ intent to seek forfeiture in the event of a conviction as to Counts One and Three, and the Defendant has had an opportunity to be heard on the matter. (ECF No. 3: Indictment.)
2. Further, the Defendant pled guilty to violations of 18 U.S.C. §§ 1343 and 2 as charged in Counts One and Three, for which forfeiture is authorized by 18 U.S.C. § 982(a)(2). (ECF No. 60: Order Accepting Plea Petition; ECF No. 61: Plea Agreement.)
3. The Defendant acknowledges that \$222,568.53 United States currency is subject to forfeiture as to Counts One and Three as it represents the proceeds traceable to violations of 18 U.S.C. §§ 1343 and 2 to which she is pleading guilty. (ECF No. 61: Plea Agreement, ¶ 14.)

4. As provided in the Plea Agreement, the Defendant consents to the entry of the forfeiture order requested herein, as well as other stipulations as set forth in her Plea Agreement. (*Id.*, at ¶¶ 14-27.)

Based on the foregoing, and the agreements and factual statements contained in the Defendant's Plea Agreement, the United States respectfully requests entry of the forfeiture money judgment requested herein.

A proposed Forfeiture Money Judgment is attached hereto for the Court's convenience.

Respectfully submitted,

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Acting United States Attorney for the  
Middle District of Tennessee

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#### CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of January 2025, a copy of the foregoing Motion for Entry of a Forfeiture Money Judgment and a proposed Forfeiture Money Judgment were filed electronically. Notice of this filing will be sent to counsel via email by operation of the Court's electronic filing system.

By: s/ Chris Suedekum  
CHRIS SUEDEKUM